

COMPLAINT TO QUIET TITLE

Now comes Robert R. R. Roberts, by Walter C. Martz, II, his attorney and files this Complaint to Quiet Title and says:

1. The Plaintiff is in possession of two (2) parcels of real property known as 15 and 17 West Seventh Street, Frederick City, Frederick County, Maryland.

2. The Plaintiff is in possession of and claims title to the real property by and through a deed from James M. Stockman and Edward W. Rose to the Plaintiff dated December 27, 1972 and recorded in Liber 899, folio 12 of the Land Records of Frederick County, Maryland, a copy of said deed is attached hereto as Plaintiff's Exhibit No. 1.

3. That a search of the Land Records of Frederick County, Maryland indicates that the Plaintiff's title to the said real property is in dispute as shown by the following facts:

(a) That Edward W. Rose and James M. Stockman were the owners of the above-described real property by virtue of a deed dated April 30, 1971 from William McK. Bopst, Jr. to Edward W. Rose and James M. Stockman and recorded in Liber 845, folio 687, of the Land Records of Frederick County, Maryland, a copy of said deed is attached hereto as Plaintiff's Exhibit No. 2.

(b) That William McKinley Bopst, Jr. was the owner of the above described real property by virtue of a deed dated April 3, 1971 from Dorothy Soper Bopst, Hallie Virginia Nikirk, James Hugh Bopst, Georgetta G. Wachter, and Ruth W. Petrus to William McKinley Bopst, Jr. and recorded in Liber 845, folio 685, of the Land Records of Frederick County, Maryland, a copy of said deed is attached hereto for Plaintiff's Exhibit No. 3.

(c) That the Grantors in Plaintiff's Exhibit No. 3 are the surviving heirs at law of Harry C. Bopst, Richard E. Bopst and Merhle L. Bopst, three of